

Response to Comment Letter I91

Jeffrey and Laura McKernan

March 3, 2014

I91-1

The County of San Diego (County) acknowledges the commenter's preference for the No Project Alternative and distributed generation. Please refer to common response ALT2, the responses to comments O10-102 to O10-115, and Draft Program Environmental Impact Report (DPEIR) Section 4.2 regarding the County's analysis of the feasibility of the distributed-generation alternative. The comment states that "[i]n basin generation must be analyzed [sic] as an alternative, but was not included." Providing solar energy in-basin is one of the Proposed Project objectives, and is therefore central to the Proposed Project (DPEIR, p. 1.0-1). The commenter also states that rooftop solar is an environmentally superior alternative. The County acknowledges that the distributed-generation alternative would result in a significant net reduction in environmental impacts compared with the Proposed Project (DPEIR, p. 4.0-4). However, the County concluded that this alternative would not feasibly meet most of the Proposed Project objectives, and therefore eliminated it from further detailed consideration in the DPEIR consistent with the California Environmental Quality Act (CEQA) Guidelines (14 CCR Section 15126.6(c); DPEIR, p. 4.0-4).

Comment Letter I91

<div style="text-align: center;"> RECEIVED MAR 03 2014 Planning and Development Services </div>		3.2.14	PG 1
TO: CO. OF S.D. P.D.S.			
ATTN: ROBERT HINGSTEN			
FROM: JEFFREY AND LAURA MCKERNAN			
RE: DPEIR SOLAR DEVELOPMENT PROJECT			
<p>WE FULLY SUPPORT THE NO PROJECT ALTERNATIVE, (ALTERNATIVE 9). IN-BASIN GENERATION MUST BE ANALYZED AS AN ALTERNATIVE BUT WAS NOT INCLUDED. ROOFTOP SOLAR ON EXISTING STRUCTURES IS A VIABLE AND PRODUCTIVE SOLUTION TO LARGE SCALE INDUSTRIAL ENERGY PROJECTS.</p>			
<p>THIS IS A VIOLATION OF CEQA GUIDELINE SECT. 15126.6, BECAUSE THIS IS A REASONABLE AND ENVIRONMENTALLY SUPERIOR ALTERNATIVE.</p>			
<p>PG 5.0-2 FULL SITE LOCATIONS AND ACRES ARE NOT PROVIDED.</p>			
<p>S.0-5 THERE IS NO GUARANTEE THAT RELIABILITY WILL BE IMPROVED FOR THE S.D. REGION BECAUSE OF SDGE'S COMMITMENT TO SELL RENEWABLE ENERGY TO THE GRID.</p>			
<p>S.0-5 THE PRODUCTION OF 168.5 M.W. CANNOT BE GUARANTEED BECAUSE OF THE INTERMITTENT PRODUCTION OF RENEWABLES, WHICH GENERALLY OPERATE AT 40-60% OF RATED CAPACITY.</p>			
<p>S.0-8 THE TULE WIND PROJECT WAS RECENTLY EXPANDED TO INCLUDE AN ADDITIONAL 20 TURBINES ON THE CUYAMACA RESERVATION. THIS WILL HAVE SUBSTANTIAL CUMULATIVE IMPACTS ON THESE PROJECTS THAT MUST BE ANALYZED.</p>			

	<p>I91-2 The commenter states that pull site locations and areas are not provided in DPEIR Chapter S.0. The County agrees that this information is not provided in the Summary chapter of the DPEIR, but refers the commenter to DPEIR Section 1.2.1.2 (p. 1.0-25) for a detailed description of construction of the off-site transmission facilities (gen-tie line), including a description of work areas, pull sites, and the methods proposed to string conductor wire between transmission poles.</p> <p>I91-3 The commenter's concern regarding electricity reliability in the San Diego region and San Diego Gas & Electric's (SDG&E's) commitment to renewable energy does not raise an environmental issue for which further response is required. Please refer to the responses to comments O10-96 and O11-4 regarding SDG&E's obligation to procure renewable generation and non-renewable generation to ensure reliability.</p> <p>The DPEIR provides that the Proposed Project would have an estimated electrical generation capacity of 168.5 megawatts (DPEIR, p. 1.0-2). The County does not have information on the Proposed Project's likely operational capacity, which the commenter estimates at 40% to 60% of rated capacity due to the intermittent production of solar energy. The County notes that the net capacity of any renewable energy facility would be taken into account by a utility off-taker and the amount</p>
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<div data-bbox="233 303 894 1130" data-label="Text"> <p style="text-align: center;">3.2.14 Pg 2</p> <p>1.0-7 THE NORMAL OPERATING TEMPERATURE FOR THE SOLAR 1.0-8 MODULES WILL BE 172° IN THE SUMMER, AND 104° IN THE WINTER. THE UNDERGROUND COLLECTION SYSTEM WILL ALSO GENERATE SURFACE HEAT, WHEN ALL THE NATIVE VEGETATION IS REMOVED, THE SURFACE TEMPERATURE WILL INCREASE. THIS WILL BE A SUBSTANTIAL INCREASE IN SURFACE TEMPERATURE. THE CPV MODULAR DENSITY ALONE, IS EQUAL TO 48 WALMART SUPERCENTERS. THIS WOULD NEVER BE ALLOWED ANYWHERE IN THE COUNTY, IN ONE TOWN OR COMMUNITY. THE POSSIBLE EFFECTS OF INCREASING SURFACE TEMPERATURE BY THIS MUCH, IN SUCH A LARGE AREA SHOULD BE ANALYZED. THESE PROJECTS THESE PROJECTS NEED TO BE IN COMPLIANCE WITH POLICY COS-14.12 (HEAT ISLAND EFFECT). 1.0-30 IF, "IN A PERFECT SCENARIO", REFLECTIONS WOULD BOUNCE BACK (DIRECTLY) TO THE SUN, WHAT PERCENTAGE OF OPERATION IS CONSIDERED A "PERFECT SCENARIO", AND WHAT ARE THE RESULTS OF AN IMPERFECT SCENARIO. THERE IS DOCUMENTATION OF PROBLEMS AT SOUTHERS NEW BERRY SPRINGS 1.5 MW FACILITY. THE PROPOSED PROJECTS DWARF THAT SITE. BOULEVARD AND ITS RESIDENTS SHOULD NOT BE AN EXPERIMENT. 1.0-42 (TABLE 1-6) DUST SUPPRESSION IS BASED ON 22 DAYS OF WINDS HIGHER THAN 15 MPH, AND IS BASED</p> </div> <div data-bbox="911 550 957 571" data-label="Text"> <p>191-5</p> </div> <div data-bbox="911 904 957 925" data-label="Text"> <p>191-6</p> </div> <div data-bbox="911 1075 957 1096" data-label="Text"> <p>191-7</p> </div>	<p>of renewable energy on the grid is a factor considered by the California Public Utilities Commission in determining electricity reliability needs.</p> <p>I91-4 As indicated in Table 1-12 of the DPEIR, the Tule Wind Energy project (MUP 3300-09-019) was included and analyzed as a cumulative project. Pursuant to the information available in MUP 3300-09-019, which was analyzed in the DPEIR, the Tule Wind Energy project includes 18 wind turbines on the Cuyapaipe Reservation. The County is not aware of an additional 20 wind turbines proposed on the Cuyapaipe Reservation as the commenter suggests.</p> <p>I91-5 San Diego County General Plan Policy COS-14.12, Heat Island Effect, states: "Require that development be located and designed to minimize the "heat island" effect as appropriate to the location and density of development, incorporating such elements as cool roofs, cool pavements, and strategically placed shade trees" (County of San Diego 2011). The trackers are lightweight and surrounded by airflow both inside and outside the tracker. As a result, heat dissipates quickly from a tracker. As described in Chapter 1.0, Project Description, of the DPEIR, the normal operating temperature for solar modules is 20 degrees Celsius (°C; 52 degrees Fahrenheit (°F)) above ambient temperature; therefore, on a typical summer day at 40°C (104°F), the panel temperature would be</p>
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	<p>approximately 60°C (172°F). When accounting for irradiance (a measure of solar radiation energy received on a given surface area in a given time), wind, and tracker type, it is expected that the peak tracker temperatures in the summer would be between 65°C and 70°C (149°F and 158°F), and the peak tracker temperatures in the winter would be between 35°C and 40°C (95°F and 104°F).</p> <p>Although the trackers would be hot to the touch as a result of solar energy absorption, trackers are designed to absorb light energy inwards towards the tracker to produce electricity. As opposed to mirrors, which redirect the sun, trackers use Fresnel lenses to concentrate sunlight inside the module to produce electricity; therefore, they would not noticeably affect the temperature of the surrounding area. Temperatures below the trackers would be nearly the same as ambient temperatures in ordinary shade. Ultimately, although the trackers do create heat due to dissipation of the heat in the trackers, they also create shade. The heat generated from the trackers is natural; without the presence of the trackers the heat would still be present, but less localized, and all the solar irradiance would be dissipated into heat in the environment. Therefore, the trackers are not anticipated to cause a rise in temperatures at the site above what would otherwise occur without the Proposed Project, or produce a heat island effect.</p>
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	<p>I91-6 The statement the commenter is referring to is intended to clarify how the technology works during the tracking procedure, in which the tracker will remain in position directly perpendicular to the sun's rays. This period occurs after the wake procedure (sunrise) and before the sleep procedure (sunset) as described in Section 1.2.2.1 of the DPEIR. The reflections and glare are analyzed in detail in Appendix 2.1-3 of the DPEIR. While in a perfect scenario reflections will bounce directly back to the sun, the analysis provided in Appendix 2.1-3 accounts for slight deviations in panel tracking movement and surface light scattering by allowing for a one degree light spread from the face of the panel.</p> <p>The commenter does not provide details or documentation regarding problems at Newberry Springs facility or how that relates to the analysis of the Proposed Project in the DPEIR; therefore, no further response is provided.</p> <p>I91-7 See response I25-2 and common response WR-1, Table 1 regarding wind data used to analyze water demands. See response to comment I27-2 for further information regarding the analysis of fugitive dust and project design features implemented as part of the Proposed Project to minimize fugitive dust.</p>
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	3.2.14 Pg 3	
	ON DATA RECORDED FROM CAMPO STATION. THERE ARE 3 WEATHER STATIONS IN BOULEVARD, WHOSE WINDS ARE GENERALLY HIGHER THAN IN CAMPO. THE DATA FROM THESE WEATHER STATIONS (BOULEVARD) MUST BE ANALYZED INSTEAD, TO ACCURATELY PROJECT WATER USAGE.	I91-7 Cont.
FIG. 2.3-12	THE RUGGED SOLAR MAP SHOWS A TOTALLY DIFFERENT USFWS CRITICAL HABITAT FOR PENINSULAR BIG HORN SHEEP THAN THE LARGEST MAP. THE RUGGED MAP HAS A 1/2 MILE BUFFER WHILE LARGEST HAS A 5 MILE BUFFER.	I91-8
	THESE MAPS SHOW A SERIOUS CONFLICT AND INACCURACY. ONE MAP CANNOT JUST BE CHOSEN WITHOUT A BIG HORN SHEEP CRITICAL HABITAT AREA STUDY BEING COMPLETED.	
3.1.9-22	(TABLE 3.1.9-1) TOTAL CONSTRUCTION DEMAND SHOULD READ GALLONS (MILLIONS) NOT (THOUSANDS).	I91-9
2.1-27	NIGHTTIME GLARE WAS NOT ANALYZED DURING MOONLIT NIGHTS WHEN PAVES ARE IN STOW POSITIONS. THIS COULD POTENTIALLY BE SEEN FROM MANY AREAS.	
2.1-50	RESIDENTS SHOULD NOT BE SUBJECTED TO THE "JUMBLED ARRANGEMENT OF VISIBLE GEN-TIE STRUCTURES AND MULTIPLE CRISSCROSSING AND SAGGING TRANSMISSION LINES THAT WOULD PRODUCE SLIGHT VISUAL CHAOS..." VISUAL CHAOS.	I91-10
2.1-54	TRACKER ROWS AND PASSING CARS WOULD NOT BE AKIN TO DRIVING ALONGSIDE ORCHARDS OR ROWCROPS BUT WOULD BE MORE AKIN TO DRIVING ALONG SIDE ROWS OF	I91-11

I91-8

The extent of the critical habitat shown on all three figures in Section 2.3 (2-3.8, 2.3-12, and 2.3-20) is the same; the only difference is the scale. The maps presented in Section 2.3 are accurate and display the critical habitat for peninsular bighorn sheep (*Ovis canadensis peninsularis*) as provided by the U.S. Fish and Wildlife Service. These maps do not depict any required buffer between the critical habitat and the Project boundaries; rather they objectively depict how close the critical habitat is to the Proposed Project.

I91-9

The header for gallons of total construction water demand in Table 3.1.9-1 on DEIR p. 3.1.9-22 is correct; however, please note that this table has been revised in response to other water demand-related comments (see common response WR1). These changes and additions to the DPEIR provide new information that clarifies or amplifies information already found in the DPEIR and do not raise important new issues about significant effects on the environment; as such these changes are insignificant as the term is used in Section 15088.5(b) of the CEQA Guidelines.

I91-10

"Night time" or lunar glare produces minimal glare intensity such that it is not typical to include this light source in the analysis when conducting glare studies. Please refer to the response to comment O10-77. In addition, the DPEIR analysis has been prepared in

	3.2.14 Pg 4	
	BOXCARS (TRAIN), OR SEMI-TRUCK TRAILERS. TRACKERS ARE MAN MADE AND "NO WAY RESEMBLE AGRICULTURE."	I91-11 Cont.
2.1-70	RENEWABLE ENERGY DEVELOPMENT IN THE STUDY AREA WOULD RESULT IN THE "INTRODUCTION OF NUMEROUS AND PROMINENT INDUSTRIAL ELEMENTS..."	
2.1-71	"THE <u>SHEER VOLUME</u> OF WIND TURBINES, TRACKERS, GEN TIE LINES, ANCILLARY FACILITIES, REFLECTIVE SURFACES, AND MECHANICAL MOVING COMPONENTS WOULD OBSTRUCT, INTERRUPT AND DETRACT..."	I91-12
2.1-72	"ONCE CONSTRUCTED THESE PROJECTS WOULD ALTER THE EXISTING RURAL CHARACTER AND WOULD INCREASE THE PROMINENCE OF INDUSTRIAL COMPONENTS..." "...AS VIEW SHED BECOMES INCREASINGLY INDUSTRIAL AND DECREASINGLY RURAL..."	
	THIS DPEIR IS NOT IN COMPLIANCE WITH THE S.D. CO. GENERAL PLAN POLICIES:	
①	LU-5.3	⑩ LU-11.2
②	LU-6.1	⑪ LU-11.11
③	LU-6.6	⑫ COS-11.1
④	LU-6.9	⑬ COS-11.3
⑤	LU-6.10	⑭ COS-11.7
⑥	LU-6.11	⑮ COS-12.2
⑦	LU-10.2	⑯ COS-14.12
⑧	LU-10.4	⑰ COS-19.1
⑨	LU-8.3	⑱ S-11.2

accordance with the County's *Guidelines for Determining Significance, Report Format and Content Requirements: Dark Skies and Glare* (County of San Diego 2009) and includes Appendix 2.1-3, the Boulevard Glare Study prepared by Power Engineers, which specifically addresses the potential glare effects associated with the Proposed Project.

The characterization of the proposed gen-tie line as a "jumbled arrangement" is presented in Section 2.1.3.2 of the DPEIR. The County acknowledges the commenter's opposition to the project. The information in this comment will be in the Final EIR for review and consideration by the decision makers.

I91-11

The analogy to row crops and orchard rows was intended to reference the repetition of rows in the landscape and the perception of these features drivers have while moving through the landscape. While trackers are man-made features, the visual experience of driving past them would be similar to that of passing by repeating rows of equally spaced features in the landscape, such as row crops or orchards. The comparison was not intended to equate these features in any other terms.

I91-12

The comment consists of excerpts from Section 2.1, Aesthetics, of the DPEIR. Because the comment does not address the adequacy of the DPEIR, no further response is provided.

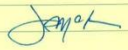

	<p>I91-13 The County disagrees with the commenter's assertion that the Proposed Project is not in compliance with the listed General Plan policies. County staff's rationale for reaching a conclusion of compliance with applicable General Plan policies can be found in Appendices 2.5-1 and 2.5-2 of the DPEIR. As the comment does not provide any specific information on the Proposed Project's alleged noncompliance with these policies, no further response can be provided.</p>
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3-2-14 PG 5

THESE PROJECTS DO NOT BELONG IN BOULEVARD,
AND HAVE FAR TOO MANY NEGATIVE, SIGNIFICANT,
UNAVOIDABLE, AND UNMITIGABLE IMPACTS TO JUSTIFY
EVEN THE "GREATER GOOD".

THE ONLY VIABLE ALTERNATIVE IS THE
NO PROJECT ALTERNATIVE.

THANK YOU,
SINCERELY

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I91-14

I91-14 The County acknowledges the commenter's opposition to the Proposed Project and support for the No Project Alternative. The decision makers have the approval authority for the Proposed Project and will consider all information in the Final Program Environmental Impact Report (FPEIR) and related documents before making a decision on the Proposed Project. The information in this comment will be in the FPEIR for review and consideration by the decision makers.

References

- 14 CCR 15000–15387 and Appendices A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.
- County of San Diego. 2009. *Guidelines for Determining Significance and Report Format and Content Requirements: Dark Skies and Glare*. County of San Diego, Land Use and Environment Group, Department of Planning and Land Use, Department of Public Works. July 30, 2007; amended January 15, 2009. http://www.sdcounty.ca.gov/pds/docs/Dark_Skies_Guidelines.pdf.
- County of San Diego. 2011. *San Diego County General Plan: A Plan for Growth, Conservation and Sustainability Conservation and Open Space Element*. Adopted August 23, 2011. http://www.sdcounty.ca.gov/pds/gpupdate/docs/BOS_Aug2011/C.1-_Conservation_and_Open_Space.pdf

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